

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
ANNE CHONG,

Plaintiff,

-against-

TARGET CORPORATION,

Defendant.  
-----X

CIVIL ACTION


Case No.: 1:14-cv-00547(WFK)(JO)

**NOTICE OF MOTION  
FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that upon the annexed Declaration of Mitchell B. Levine, dated February 16, 2015, with exhibits annexed thereto, the Rule 56.1 Statement dated February 19, 2015, the annexed Memorandum of Law dated February 19, 2015, and upon all prior pleadings and proceedings, the undersigned will move before the Court, pursuant to Rule 56.1 of the Federal Rules of Civil Procedure, before the Honorable Judge William F. Kuntz, at the United States Courthouse for the Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, New York 11201, on May 1, 2015, for an Order: Granting summary judgment in favor of Defendant, Target Corporation. (hereinafter referred to as "Target"), and dismissing the plaintiff's Complaint as against Target; together with such other and further relief as this Court deems just and proper.

Dated: New York, New York  
February 19, 2015

Yours etc.,

  
\_\_\_\_\_  
MITCHELL B. LEVINE (ML 0998)  
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File No.: TARN-74-ML

TO: OFSHTEIN LAW FIRM, P.C.  
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